

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

TIMOTHY BREMER, Individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SOLARWINDS CORPORATION, KEVIN B.
THOMPSON, and J. BARTON KALSU,

Defendants.

Case No. 1:21-cv-00002-RP

CLASS ACTION

DANIEL AZPURUA, Individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SOLARWINDS CORPORATION, KEVIN B.
THOMPSON, and J. BARTON KALSU,

Defendants.

Case No. 1:21-cv-00047-RP

CLASS ACTION

Caption continued on next page.

**DECLARATION OF GERALD T. DROUGHT IN SUPPORT OF THE UNOPPOSED
MOTION OF NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS PENSION
FUND FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD
PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION
OF LEAD COUNSEL**

NEW YORK CITY DISTRICT COUNCIL OF
CARPENTERS PENSION FUND, on behalf of
itself and all others similarly situated,

Plaintiff,

v.

SOLARWINDS CORPORATION, KEVIN B.
THOMPSON, and J. BARTON KALSU,

Defendants.

Case No. 1:21-cv-00138-RP

CLASS ACTION

I, Gerald T. Drought, declare as follows:

1. I am President and Chairman of the law firm of Martin & Drought, P.C. I make this declaration in support of the Unopposed Motion of New York City District Council of Carpenters Pension Fund (“NYC Carpenters”) for an order: (i) consolidating the above-captioned related securities class actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; (ii) appointing NYC Carpenters as Lead Plaintiff; (iii) approving its selection of Bernstein Litowitz Berger & Grossmann LLP (“Bernstein Litowitz”) as Lead Counsel for the Class; and (iv) granting any such further relief that the Court may deem just and proper.

2. Attached as Exhibits A through G are true and correct copies of the following documents:

EXHIBIT A: Certification of NYC Carpenters;

EXHIBIT B: Chart of transactions and losses of NYC Carpenters;

EXHIBIT C: Chart of transactions and losses of Timothy Bremer;

EXHIBIT D: Chart of transactions and losses of Daniel Azpurua;

EXHIBIT E: Notice of pendency of *Bremer v. SolarWinds Corporation*, No. 1:21-cv-00002-RP (W.D. Tex.), published on January 4, 2021;

EXHIBIT F: Notice of pendency of *New York City District Council of Carpenters Pension Fund v. SolarWinds Corporation*, No. 1:21-cv-00138-RP (W.D. Tex.), published on February 9, 2021; and

EXHIBIT G: Firm résumé of Bernstein Litowitz.

I declare under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this 9th day of March, 2021.

/s/ Gerald T. Drought

Gerald T. Drought

CERTIFICATE OF SERVICE

I certify that on March 9, 2021, a true and correct copy of the foregoing document was filed with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ Gerald T. Drought
Gerald T. Drought